

**Federal Express 8017 5153 3872**

February 13, 2013

Ms. Ingrid H. Hopkins  
Water Protection Division (3WP42)  
US EPA – Region III  
1650 Arch Street  
Philadelphia, PA 19103-3029  
(215) 814-5437  
[hopkins.ingrid@epa.gov](mailto:hopkins.ingrid@epa.gov)

**RE: Benning Road Generating Station – NPDES Permit No. DC 0000094  
Metal Excursion – Outfall 013Q**

Dear Ms. Hopkins,

This letter is a follow-up to the February 8, 2013 telephone notification, made on behalf of Pepco Energy Services, Inc. by Ms. Heather Brinkerhoff of HB Consulting LLC., to report daily maximum copper and zinc excursions from a storm water grab sample taken on January 16, 2013, from Outfall 013.

On February 8, 2013, Ms. Brinkerhoff received the laboratory analysis indicating daily maximum concentrations for copper and zinc were exceeded. On that same date, Ms. Brinkerhoff made the required telephone notification to the U.S. Environmental Protection Agency (EPA) per NPDES permit condition VI.6.

Lab results indicated the following:

Analyte	Units	Permit Limit Daily Max	Results
Copper	ug/L	13.44	20
Zinc	ug/L	117.18	120

We cannot identify the specific cause of these permit excursions. However, the facility has been implementing a program to reduce concentration of metals in the storm water discharge attributable to general surface exposures at the facility site, as required by NPDES permit condition VII.E. On July 19, 2010, the facility submitted a TMDL Implementation Plan to EPA which provided information on past, current, and planned activities at the facility to meet the required load reductions for the Anacostia River TMDLs for metals. The facility recently completed the implementation of Phase I and Phase II control measures recommended in the TMDL plan. Phase I control measures completed in November 2012 consisted primarily of the installation of metal and oil absorbing booms in and around the storm drain

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*Pepco Energy Services, Inc. is not the same company as Potomac Electric Power Company (Pepco), the regulated utility, and*

inlets throughout the facility. Phase II control measures completed by December 31, 2012 consisted of removing stored equipment and materials from areas exposed to the weather or covering them for protection from the rainfall, and improved housekeeping practices. A status update regarding the implementation of Phase I and Phase II control measures was submitted to EPA on January 7, 2013. A copy of this status report is attached (along with updated tables used as a tool for tracking the implementation of these measures).

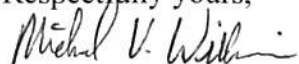
A comparison of daily maximum metal concentrations in the storm water samples collected in January 2013 vs. November 2012 indicates that the controls measures implemented at the facility have been effective in reducing metal concentrations in the facility's storm water discharge, as shown in the following table:

Analyte	Units	Permit Limit Daily Max	November 2012 Results	January 2013 Results
Iron	ug/L	1.00	1.2	0.94
Copper	ug/L	13.44	26	20
Zinc	ug/L	117.18	210	120

As indicated in the attached status update, the overall percent reductions of pollutant concentrations in the storm water discharges from outfall 013 will be calculated and reported to EPA on a quarterly basis in 2013 as the analytical results of the storm water sampling become available. Further measures to reduce metals concentrations will be considered as part of the ongoing implementation of the TMDL Plan.

Please contact me at (703) 253-1787 or by electronic mail at [mwilliams@pepcoenergy.com](mailto:mwilliams@pepcoenergy.com) if you need additional information.

Respectfully yours,



Michael V. Williams  
Power Plant Asset Manager  
Pepco Energy Services, Inc.